



June 24, 2005

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Room TW-B204  
Washington, D.C. 20554

RE: *Ex Parte* File, WT Docket Number 02-353, *Service Rules for Advanced Wireless Services in the 1.7 and 2.1 GHz Bands*

Dear Ms. Dortch:

Nortel submits this *ex parte* letter in response to recently filed proposals that the Commission revise its band plan for Advanced Wireless Services (AWS) in the 1710 to 1755 MHz and 2110 to 2155 MHz bands.<sup>1</sup>

Nortel is a recognized leader in delivering communications capabilities. Serving both service provider and enterprise customers in more than 150 countries, Nortel delivers innovative technology solutions encompassing end-to-end broadband, Voice over IP, multimedia services and applications, and wireless broadband.

Nortel joins with other commenters in this proceeding to urge the Commission to: 1) adopt a band plan that enables carriers to aggregate sufficient spectrum to accomplish their individual business objectives without auctioning a dedicated 30 MHz license and 2) increase the number of spectrum blocks to six from the current five.

Nortel agrees that the increasing use of broadband technologies and the increasing demand for broadband services will require that wireless operators have access to larger amounts of spectrum than currently available.<sup>2</sup> In agreement with other commenters, Nortel believes that the auctioning of a 30 MHz license is not necessary to facilitate the deployment of such

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<sup>1</sup> See, *ex-parte* communications of Verizon Wireless and joint *ex parte* of T-Mobile and Rural Telecommunications Group, *In the matter of Service Rules for Advanced Wireless Service in the 1.7 and 2.1 GHz Bands* ("AWS proceeding") 18 FCC Rcd 25612 (2003) (filed May 27, 2005) ("Verizon Wireless *ex parte*" and "T-Mobile/RTG *ex parte*" respectively). See also, *ex parte* communication of Cingular Wireless (filed May 27, 2005) filed in the AWS proceeding.

<sup>2</sup> See generally, Verizon Wireless *ex parte* and T-Mobile/RTG *ex parte*.



technologies and services.<sup>3</sup> A band plan that provides operators with the flexibility to aggregate spectrum (e.g., 30 MHz) where business needs dictate will accomplish the Commission's competition goals for the referenced band and enable carriers to access the spectrum needed to accomplish specific broadband and other business objectives.

Nortel also supports proposals to increase the number of blocks to six.<sup>4</sup> While affording additional flexibility for bidders, the availability of six blocks will also better promote competition in all areas of the country, including rural and underserved areas by enabling carriers to match the business plans for specific geographic areas with appropriate amounts of spectrum.<sup>5</sup>

Should you have any questions, please contact me. This letter is being filed electronically pursuant to Section 1.1206 of the Commission's rules.

Sincerely yours,

/s/

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<sup>3</sup> *See*, T-Mobile/RTG ex parte, Verizon Wireless ex parte. *See also*, ex parte communication of Ericsson (filed March 30, 2005), ex parte of Nokia (filed May 20, 2005) and ex parte communication of PCIA (filed June 8, 2005) ("PCIA ex parte") filed in the AWS proceeding.

<sup>4</sup> Verizon Wireless ex parte and T-Mobile/RTG ex parte.

<sup>5</sup> *Id.*